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FILED IN THE  
U.S. DISTRICT COURT  
EASTERN DISTRICT OF WASHINGTON  
  
**Feb 09, 2021**  
  
SEAN F. MCAVOY, CLERK

9 UNITED STATES DISTRICT COURT  
10 FOR THE EASTERN DISTRICT OF WASHINGTON

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 MARIA MENDEZ-GUTIERREZ and  
15 JERONIMO PEREZ-GUTIERREZ,

16 Defendants.

1:21-CR-2007-SAB  
INDICTMENT

Vios: 8 U.S.C. § 1324(a)(1)(A)(iii), (B)(i)  
Harboring an Illegal Alien  
(Count 1)

8 U.S.C. § 1324(a)(1)(A)(iv), (B)(i)  
Encouraging or Inducing Illegal  
Immigration  
(Counts 2, 3)

8 U.S.C. § 1324(b), 18 U.S.C.  
§ 982(a)(6)(A), 28 U.S.C. § 2461  
Forfeiture Allegations

17 The Grand Jury charges:

18 COUNT 1

19 On or about January 14, 2021, in the Eastern District of Washington, the  
20 Defendant, MARIA MENDEZ-GUTIERREZ, knowing and in reckless disregard  
21 of the fact that an alien, namely, M.H.P., had come to, entered and remained in the  
22 United States in violation of law, did conceal, harbor, and shield from detection

1 such alien in buildings and other places for the purpose of commercial advantage  
2 and private financial gain, in violation of 8 U.S.C. § 1324(a)(1)(A)(iii), (B)(i).

3  
4 COUNT 2

5 Beginning on an exact date unknown, but in or about December of 2020, and  
6 continuing until on or about January 14, 2021, in the Eastern District of  
7 Washington, the Defendant, MARIA MENDEZ-GUTIERREZ, did encourage and  
8 induce an alien, namely, M.H.P., to come to, enter and reside in the United States,  
9 knowing and in reckless disregard of the fact that such coming to, entry, and  
10 residence in the United States was in violation of law, for the purpose of  
11 commercial advantage and private financial gain, in violation of 8 U.S.C.  
12 § 1324(a)(1)(A)(iv), (B)(i).

13 COUNT 3

14 On an exact date unknown, but in or about January of 2019, in the Eastern  
15 District of Washington, the Defendant, JERONIMO PEREZ-GUTIERREZ, did  
16 encourage and induce an alien, namely, C.G.P., to come to, enter and reside in the  
17 United States, knowing and in reckless disregard of the fact that such coming to,  
18 entry, and residence in the United States was in violation of law, for the purpose of  
19 commercial advantage and private financial gain, in violation of 8 U.S.C.  
20 § 1324(a)(1)(A)(iv), (B)(i).

21 NOTICE OF CRIMINAL FORFEITURE

22 The allegations contained in this Indictment are hereby realleged and  
23 incorporated by reference for the purpose of alleging forfeitures.

24 Pursuant to 8 U.S.C. § 1324(b), 18 U.S.C. § 982(a)(6)(A), and 28 U.S.C.  
25 § 2461(c), upon conviction of an offense in violation of 8 U.S.C. § 1324, as alleged  
26 in Counts 1 – 3 of this Indictment, the Defendants, MARIA MENDEZ-  
27 GUTIERREZ and JERONIMO PEREZ-GUTIERREZ, shall forfeit to the United  
28 States of America, any conveyance, including any vessel, vehicle, or aircraft, used

1 in the commission of the offense of which the Defendants are convicted; any  
2 property, real or personal, that constitutes or is derived from or is traceable to the  
3 proceeds obtained directly or indirectly from the commission of the offense of  
4 which the Defendants are convicted; and, any property, real or personal, used to  
5 facilitate or intended to be used to facilitate the commission of the offense of  
6 which the Defendants are convicted.

7 If any of the property described above, as a result of any act or omission of  
8 the Defendants:

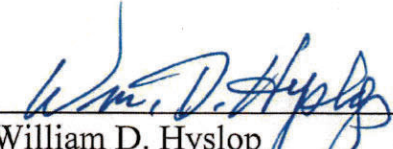
- 9
- 10 a. cannot be located upon the exercise of due diligence;
  - 11 b. has been transferred or sold to, or deposited with, a third party;
  - 12 c. has been placed beyond the jurisdiction of the court;
  - 13 d. has been substantially diminished in value; or
  - 14 e. has been commingled with other property which cannot be divided  
15 without difficulty,

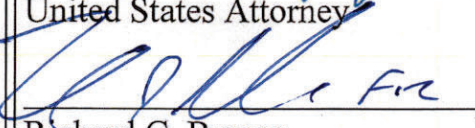
16 the United States of America shall be entitled to forfeiture of substitute property  
17 pursuant to 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 982(b)(1) and 28  
18 U.S.C. § 2461(c).

19 DATED this 9 day of February, 2021.

20  
21 A TRUE BILL ,

22  
23 For a person

24   
25 William D. Hyslop  
26 United States Attorney

27   
28 Richard C. Burson  
Assistant United States Attorney